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December 23, 2013

**Via Electronic Filing**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re: Ex Parte Notice - In the Matter of Rural Call Completion, WC  
Docket No. 13-39**

Dear Ms. Dortch:

On December 19, 2013, the undersigned and Brendan Kasper of Vonage Holdings Corp. ("Vonage") met with the following representatives of the Wireline Competition Bureau: Lisa Gelb, William Dever, Carol Simpson, and Gregory Kwan. Vonage provided the Commission with an update as to where it stands in complying with the ring signaling rules. The company noted that it currently only plays ring signaling if it has not received a ring signal from an intermediate telecommunications within four seconds. Only a small percentage of its total calls do not receive a ring signal from an intermediate carrier within four seconds.

The customer's analog terminal adapter currently generates this ring signal. It is not possible for Vonage to modify the analog terminal adapter to deliver a messaging solution consistent with the new ring signaling rules. Thus, Vonage is significantly modifying its service to deliver network-generated messages to its subscribers when it has not received a ring signal from an intermediate carrier within four seconds.

We also discussed the new information collection and reporting obligations that are not yet effective. In particular, Vonage discussed the addition of separate reporting for interstate and intrastate call completion to the final order. Under the Commission's rules, all of Vonage's long distance traffic is subject to interstate access and there is no reason for Vonage to separately track interstate and intrastate long distance traffic. Given this uniform rate structure, there is also no reason to expect that this distinction makes any difference for call performance.

Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

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Ronald W. Del Sesto, Jr.

cc: Lisa Gelb  
William Dever  
Carol Simpson  
Gregory Kwan  
Brendan Kasper (Vonage)